

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
3 Las Vegas, Nevada 89118
702.893.3383
4 Fax: 702.893.3789
Attorneys for Defendants
5 City of North Las Vegas,
Officer Paul Maalouf and Officer Travis Snyder
6

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9
10 THOMAS WALKER, an individual, and
CATHY CATALDO, an individual,

11 Plaintiffs,

12 vs.

13 CITY OF NORTH LAS VEGAS, OFFICER
PAUL MAALOUF, individually and in his
14 official capacity as a North Las Vegas Police
Department Officer, OFFICER TRAVIS
15 SNYDER, individually and in his official
capacity as a North Las Vegas Police
16 Department Officer,

17 Defendants.
18

CASE NO. 2:14-cv-01475-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND THE DEADLINES FOR THE
PARTIES TO FILE THEIR OPPOSITIONS
TO MOTIONS FOR SUMMARY
JUDGMENT**

FIRST REQUEST

19 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
20 record, hereby stipulate and request that this Court extend the deadline to file the oppositions to
21 motions for summary judgment in the above-captioned case thirty-two (32) days, up to and
22 including May 7, 2018.

23 This Request for an extension of time is not sought for any improper purpose or other
24 purpose of delay. This request for extension is based upon the following:

25 Counsel for defendants has been occupied with preparing an reply brief in *Bryant v.*
26 *Donohue*, 2:16-cv-1172-GMN-PAL. In addition, the defendants have been occupied in preparing
27 reply briefs in *Mitchell v. City of North Las Vegas*, 17-16552, and *Weathers v. Loumakis*, 17-
28 17074.

1 Counsel for plaintiffs has an Answering Brief and Supplemental Excerpts of Records due
2 on April 4, 2018 in *J.D.H. v. Las Vegas Metropolitan Police Department*, Ninth Circuit Case No.
3 17-16512. Plaintiffs' counsel also has a competing deadline to file a Special Motion to Dismiss
4 Pursuant to Nev. Rev. Stat. § 41.660 (anti-SLAPP) in *Hartfield v. Office of Clark County Coroner*,
5 Eighth Judicial District Court Case No. A-18-768781-C.

6 Counsel for the parties have met and conferred on this topic and have agreed that, to best
7 serve the interests of the parties and obviate the potential for future motion practice, the most
8 efficient remedy is to reasonably extend the dispositive motion deadline for both parties.

9 ...

10 ...

11 ...

12 ...

13 ...

14 ...

15 ...

16 ...

17 ...

18 ...

19 ...

20 ...

21 ...

22 ...

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

1 WHEREFORE, the parties respectfully request that this Court extend the time for the
2 parties to file their oppositions to motions for summary judgment by thirty-two (32) days from the
3 current deadline of April 5, 2018 up to and including May 7, 2018.

4 DATED this 2nd day of April, 2018.

DATED this 2nd day of April, 2018.

5 LEWIS BRISBOIS BISGAARD & SMITH

MCLEATCHIE SHELL

6
7 /s/ Robert W. Freeman

8 Robert W. Freeman, Jr., Esq.
9 Nevada Bar No. 3062
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorneys for Defendants

/s/ Margaret A. McLetchie

Margaret A. McLetchie, Esq.
Nevada Bar No. 10931
Alina M. Shell, Esq.
Nevada Bar No. 11711
701 East Bridger Avenue
Suite 520
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

12 and

13
14 MAUPIN, NAYLOR BRASTER
Jennifer K. Braster, Esq.
15 Nevada Bar No. 9982
1050 Indigo Drive, Suite 110B
16 Las Vegas, Nevada 89145
Attorneys for Plaintiffs

17
18 **ORDER**

19 IT IS SO ORDERED.

20 Dated: April 2, 2018.

21
22 
23 U.S. DISTRICT COURT JUDGE
24
25
26
27
28